

THE HONORABLE JUDGE ROBERT S. LASNIK

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

S.L., by and through his parents and  
guardians, J.L. and L.L.,

Plaintiffs,

v.

PREMERA BLUE CROSS; AMAZON  
CORPORATE LLC GROUP HEALTH  
AND WELFARE PLAN; AND  
AMAZON CORPORATE LLC,

Defendants.

Case No.: 2:18-cv-01308-RSL

**DECLARATION OF GWENDOLYN C.  
PAYTON IN SUPPORT OF DEFENDANTS'  
MOTION FOR SUMMARY JUDGMENT**

**NOTE ON MOTION CALENDAR:  
SEPTEMBER 2, 2022**

**ORAL ARGUMENT REQUESTED**

I Gwendolyn C. Payton, being duly sworn upon oath, deposes and states:

1. I am counsel for Defendants Premera Blue Cross; Amazon Corporate LLC Group Health and Welfare Plan; and Amazon Corporate LLC in this action. I make this declaration of my personal knowledge in support of Defendants' Motion for Summary Judgment.

2. Exhibit 1 is a true and accurate copy of the "Catalyst Residential Treatment, LLC" web page from the "Programs for Troubled Teens" website located at <https://programsfortroubledteens.com/directory/catalyst-residential-treatment-llc/>

3. Exhibit 2 is a true and accurate copy of the Catalyst website located at <https://catalystrtc.com/>

DECLARATION OF GWENDOLYN C. PAYTON IN SUPPORT OF  
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT - 1

KILPATRICK TOWNSEND & STOCKTON LLP  
1420 FIFTH AVENUE, SUITE 3700  
SEATTLE, WA 98101  
(206) 626-7713 FAX: (206) 260-8946

1 4. Exhibit 3 is a true and accurate copy of the “Wilderness” section of the “Evoke Therapy  
2 Programs” website located at [https://evoketherapy.com/programs/wilderness-  
3 therapy/wilderness-therapy-for-young-adults/](https://evoketherapy.com/programs/wilderness-therapy/wilderness-therapy-for-young-adults/)

4 I declare under penalty of perjury that the forgoing is true and correct.

5  
6 DATED: August 9, 2022

7 By /s/ Gwendolyn C. Payton  
8 Gwendolyn C. Payton, WSBA No. 26752  
9 gpayton@kilpatricktownsend.com  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY under the penalty of perjury that on August 9, 2022 I electronically filed the foregoing DECLARATION OF GWENDOLYN C. PAYTON IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

**Megan E Glor**  
MEGAN E. GLOR, ATTORNEYS AT  
LAW  
707 NE KNOTT STREET, STE 101  
PORTLAND, OR 97212  
503-223-7400  
Fax: 503-751-2071  
Email: megan@meganglor.com

**Eleanor Hamburger**  
**Richard E Spoonemore**  
SIRIANNI YOUTZ SPOONEMORE  
HAMBURGER  
3101 WESTERN AVENUE STE 350  
SEATTLE, WA 98121  
206-223-0303  
Fax: 206-223-0246  
Email: ehamburger@sylaw.com  
Email: rspoonemore@sylaw.com

DATED this 9<sup>th</sup> day of August, 2022.

**Kilpatrick Townsend & Stockton LLP**

By: s/ Gwendolyn C. Payton  
Gwendolyn C. Payton, WSBA #26752  
Attorneys for Defendants Premera Blue Cross,  
Amazon Corporate LLC Group Health and  
Welfare Plan, and Amazon Corporate LLC